

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

IN RE:

Jackson Green, LLC,

Case No 11-14038

Debtor.

MOTION FOR USE OF CASH COLLATERAL, TO SHORTEN
THE NOTICE TO TEN DAYS AND TO LIMIT NOTICE TO
THE U.S. TRUSTEE AND WELLS FARGO BANK N.A.

NOW COMES the Debtor, Jackson Green, LLC by its attorney, Terrence J. Byrne, and moves the Court to permit the use of cash collateral in the nature of the following adequate protection:

- a) One-twelfth (1/12) of the real estate taxes to be paid to an escrow account;
- b) Insurance on the property;
- c) Maintenance of the property;
- d) Payments of \$125,000.00 per month; and
- e) A replacement lien in future rents.

The Debtor also moves the Court to approve limiting Notice to ten days and providing Notice only to the U.S. Trustee and Wells Fargo Bank N.A. on the basis that without the use of the cash collateral the Debtor is unable to operate the business and an immediate determination of use of cash collateral is necessary so the Debtor can continue to operate the business. Attached are cash flow projections.

WHEREFORE, the Debtor requests that pursuant to Section 363 the Court permit the Debtor to use the cash collateral and approve limiting notice to ten days and providing Notice only to the U.S. Trustee and Wells Fargo Bank N.A.

Dated this 27th day of June, 2011.

A handwritten signature in dark ink, appearing to read 'T. Byrne', is written over a horizontal line.

Terrence J. Byrne
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Jackson Green Monthly Pro Forma NOI

	<u>Jul-11</u>	<u>Aug-11</u>	<u>Sep-11</u>	<u>Oct-11</u>	<u>Nov-11</u>	<u>Dec-11</u>	<u>Jan-12</u>	<u>Feb-12</u>	<u>Mar-12</u>	<u>Apr-12</u>	<u>May-12</u>	<u>Jun-12</u>	<u>Total</u>
Rental Income (*)	\$175,834	\$160,420	\$161,718	\$162,526	\$152,358	\$152,358	\$152,358	\$149,003	\$142,770	\$143,181	\$143,181	\$141,568	\$1,837,276
Expense Reimb - CAM & RET	\$7,252	\$7,252	\$7,252	\$7,252	\$7,252	\$7,252	\$7,252	\$7,252	\$7,252	\$7,252	\$7,252	\$7,252	\$87,024
Storage Income	\$595	\$595	\$595	\$595	\$595	\$595	\$595	\$595	\$595	\$595	\$595	\$595	\$7,140
Parking Lot Income	\$12,592	\$12,592	\$12,592	\$12,592	\$9,232	\$9,278	\$9,478	\$9,478	\$9,478	\$9,478	\$9,478	\$9,478	\$125,748
Other Income	<u>\$1,000</u>	<u>\$1,000</u>	<u>\$1,000</u>	<u>\$1,000</u>	<u>\$1,000</u>	<u>\$1,000</u>	<u>\$1,000</u>	<u>\$1,000</u>	<u>\$1,000</u>	<u>\$1,000</u>	<u>\$1,000</u>	<u>\$1,000</u>	<u>\$12,000</u>
Total Income	\$197,273	\$181,859	\$183,157	\$183,965	\$170,437	\$170,483	\$170,684	\$167,329	\$161,096	\$161,506	\$161,506	\$159,894	\$2,069,188
Utilities Expense	\$12,151	\$12,098	\$13,995	\$9,445	\$12,369	\$6,572	\$18,715	\$17,694	\$11,693	\$14,203	\$10,347	\$9,923	\$149,207
Repairs/Maintenance	\$15,643	\$10,700	\$20,510	\$6,080	\$11,014	\$6,214	\$7,763	\$8,341	\$8,611	\$11,650	\$18,952	\$10,000	\$135,479
Janitorial	\$6,055	\$5,947	\$5,947	\$5,947	\$5,947	\$6,204	\$5,947	\$5,947	\$5,947	\$5,947	\$6,684	\$5,044	\$71,561
Parking Lot Rent	\$14,113	\$14,113	\$14,113	\$14,113	\$14,113	\$14,113	\$14,113	\$14,113	\$14,113	\$14,113	\$14,113	\$14,113	\$169,356
Supplies	\$0	\$0	\$4,187	\$259	\$0	\$0	\$1,202	\$0	\$0	\$12	\$49	\$925	\$6,635
General & Admin.	\$6,098	\$4,096	\$7,536	\$4,132	\$5,462	\$4,417	\$2,958	\$3,882	\$4,487	\$4,404	\$5,505	\$7,605	\$60,581
Insurance	\$3,296	\$3,296	\$3,296	\$3,296	\$3,296	\$3,424	\$3,311	\$3,310	\$3,310	\$3,326	\$3,392	\$3,392	\$39,946
Real Estate Taxes	\$42,083	\$42,083	\$42,083	\$42,083	\$42,083	\$42,083	\$42,083	\$42,083	\$42,083	\$42,083	\$42,083	\$42,083	\$504,996
Management Fees	<u>\$5,918</u>	<u>\$5,456</u>	<u>\$5,495</u>	<u>\$5,519</u>	<u>\$5,113</u>	<u>\$5,114</u>	<u>\$5,121</u>	<u>\$5,020</u>	<u>\$4,833</u>	<u>\$4,845</u>	<u>\$4,845</u>	<u>\$4,797</u>	<u>\$62,076</u>
Total Expenses	\$105,357	\$97,788	\$117,161	\$90,874	\$99,397	\$88,141	\$101,213	\$100,390	\$95,077	\$100,584	\$105,971	\$97,883	\$1,199,837

(*) Assumes no additional leasing for the next 12 months.